

ROBERT VILENSKY
MICHAEL RONEMUS
[ALSO ADMITTED CT & MA]
ARLENE ILG
LORI K. SAFIR
ERICA ANDERSON

RONEMUS & VILENSKY, LLP

ATTORNEYS AT LAW

KATHY CHIODY
[ADMINISTRATOR]
CHRISTINE DIAZ
DIANA CASTILLO
[PARALEGALS]

February 11, 2008

Judge Charles L. Bricant
US District Court
300 Quarropas St
White Plains, NY 10601
Via Fax: 914. 390 4085

MEMO ENCLOSED

*Application for
to Order
2/14/08
USDC*

Re: Duncan v. Sound Shore Medical Center and United States of America
07 CV 3094

Dear Judge Bricant:

This letter is a request on behalf of all attorneys to extend the time to complete discovery in this case. This is a medical malpractice case on behalf of an infant injured at birth. Counsel for all parties have been cooperating to move discovery. The delay has been in that there are a significant number of medical records which the defendants justifiably want to have before conducting depositions. Our office has been working with defendants to obtain those records.

Defense counsel now indicate that they are prepared to conduct plaintiff's deposition. Ms. Duncan, the infant's mother, lives in Florida and has made plans to travel to New York for her deposition and for a medical exam of the infant which has been scheduled by the U.S. Attorney's office. The physical exam is scheduled for February 28th and the deposition is scheduled for February 29th.

Mr. Clopper, counsel for the U.S., has indicated that he will attempt to bring the two doctors to New York for depositions during the month of March.

For these reasons on behalf of all counsel, I request that all dates in the January 3rd scheduling order be extended for two months.

At this time there is a conference scheduled for March 14th. Since the defendants' depositions will not have been completed by that time, it would make sense to adjourn that conference to April 14th or a date convenient with the court. Please advise us if this is acceptable.

Very truly yours,

Michael B. Ronemus

MBR/ cm